

1 **DAVID M. MICHAEL, CSBN 74031**
2 **MICHAEL & BURCH LLP**
3 **One Sansome Street, Suite 3500**
4 **San Francisco, CA 94104**
5 **Telephone: (415) 946-8996**
6 **Facsimile: (877) 538-6220**
7 **E-mail: david@michaelburchlaw.com**

8 **Attorney for Defendant**
9 **EVGENI KOPANKOV**

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,

13 **No. 19-CR-00178 VC**

14 Plaintiff,

15 v.

16 EVGENI KOPANKOV,

17 **DECLARATION OF COUNSEL RE**
18 **HEARING ON CONDITIONS OF**
19 **RELEASE.**

20 Defendant.

21 **Date: May 13, 2021**
22 **Time: 9:30 a.m.**
23 **Dept. Magistrate Court**

24 **I, David Michael, declare as follows:**

- 25 1. I am counsel for Defendant EVGENI KOPANKOV in the above matter.
- 26 2. I make this Declaration in regards to issues that may arise in the upcoming hearing of
27 May 13, 2021 as to any clarification of this Court's prior order of October 15, 2020
28 regarding Mr.Kopankov's conditions of release.
3. It was the undersigned counsel's understanding that this Court, due to the trucking
business of Mr, Kopankov, which regularly took him out of the state of Illinois as part of
that business, was allowed to make such travel outside of the state of Illinois so long as
Pretrial Services in Chicago was notified of such travel.
4. On or about February 19, 2021, Mr, Kopankov prepared for and did travel to the state of
Washington and California on business. He was preparing a vehicle for sale and had

1 transported that vehicle initially by truck. When he removed the vehicle from the
2 transport truck and was driving it to a dealer for repair, he was stopped by law
3 enforcement and his ID and the vehicle registration were checked. No citation was
4 issued to Mr. Kopankov.

5 5. Following that encounter with law enforcement in California, Mr. Kopankov and his
6 wife, Maria, had a three-way conversation with Pretrial Services Officer Heather Mulry
7 in Chicago. No further action or requirement was made or requested by Pretrial Services
8 in Chicago following that report.

9 6. At all times, Mr. Kopankov and his wife Maria Zeliyeva were in contact with Pretrial
10 Services in Chicago regarding Mr. Kopankov's travels outside of the state of Illinois.

11 7. Below are the email communications between Ms. Zeliyeva and Pretrial Services
12 regarding the exact incident this Court is asked to consider at this hearing:

13 From: **Maria Zeliyeva** <mariajj11@gmail.com>

14 Date: Fri, Feb 19, 2021 at 6:28 PM

15 Subject: Re: Automatic reply: New password - ERS

16 To: Heather Mulry <Heather_Mulry@ilnpt.uscourts.gov>

17 Hi Miss Heather,

18 Evgeni will be leaving back to Seattle tomorrow.

19 Thank you have a great weekend and stay safe and warm!

20 Best Regards,

21 Maria!

22 Sent from my iPhone
23

24 On Feb 19, 2021, at 4:22 PM, Heather Mulry <Heather_Mulry@ilnpt.uscourts.gov> wrote:
25

26 Thank you Maria, have a great weekend!

27 **From:** Maria Zeliyeva <mariajj11@gmail.com>

28 **Sent:** Monday, February 15, 2021 9:14 PM

To: Heather Mulry <Heather_Mulry@ilnpt.uscourts.gov>

Subject: Re: Automatic reply: New password - ERS

Hi Miss Heather,

I just wanted to update you that Evgeni will fly home from Seattle on Wednesday the 17th. I hope you are staying warm!

Best Regards,

Maria!

Sent from my iPhone

On Feb 12, 2021, at 12:35 PM, Heather Mulry <Heather_Mulry@ilnpt.uscourts.gov> wrote:

Thank you Maria, for the monthly check-in and employment verification. Have a great weekend and stay warm!

From: Maria Zeliyama <mariajj11@gmail.com>

Sent: Friday, February 12, 2021 12:31 PM

To: Heather Mulry <Heather_Mulry@ilnpt.uscourts.gov>

I declare, under penalty of perjury, that the foregoing is true and correct and that this Declaration was executed on May 13 2021 at San Francisco, CA.

s/David M. Michael

DAVID M. MICHAEL
Attorney for Defendant EVGENI KOPANKOV

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that, on May 13, 2021, I caused to be electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/David M. Michael

DAVID M. MICHAEL
Attorney for Defendant EVGENI KOPANKOV